



Commercial Telecom Systems, Inc.

3500 Lakeside Dr., Oklahoma City, OK 73107 • TEL (405) 632-0855 • FAX (405) 749-0855 • Lewis Ave., Tulsa, OK 74107 • 1(800) 632-0855 • FAX (918) 749-0855

FCC MAIL ROOM

OCT 16 1996

October 9, 1996

William A. Caton, Secretary of FCC  
Federal Communications Commission  
1919 M Street NW  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE: Bundling of CPE by Interexchange Carriers, CC Docket 96-61

Dear Mr. Caton,

As a competitive Value Added Reseller ("VAR"), we wish to express our strong opposition to the Commission's proposal to allow interexchange carriers to bundle customer premises equipment ("CPE") with their regulated transmission service.

Value Added Resellers purchase equipment from independent CPE manufacturers. We then combine equipment from different manufacturers to provide customized solutions that meet the individualized needs of our customers. Because most of our customers are small to medium size businesses, they lack the resources or sophistication to assemble such customized solutions themselves. As a result, VARs are an important source of choice for these users.

If the Commission allows CPE bundling, we believe that many VARs will be forced out of business. Bundling would allow carriers to offer packages that combine transmission service with "free" CPE. A company such as ours simply cannot compete against such an offer. As a result, end-users will have no practical choice but to accept the CPE chosen by their carriers, even if it is not the best equipment for their needs. This result would not be in the public interest.

We therefore urge the Commission to retain the current rule, thereby allowing us to continue to provide increased choice to our customers.

Sincerely,

Mark Whitten, Inc.

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**CTS**

**Commercial Telecom Systems, Inc.**

3500 Lakeside Dr. • Channahon, IL 61018 • TEL (815) 598-1100 • FAX (815) 598-4500 • Lewis & Clark • OK 74107 • 1(800) 632-0855 • FAX (918) 749-0855

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We therefore urge the Commission to retain the current rule, thereby allowing us to continue to provide increased choice to our customers.

Sincerely,

*Bill Calhoun*

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**Commercial Telecom Systems, Inc.**

3500 Lakeside Dr. - Oklahoma City, OK 73104-4051 • FAX (800) 632-0855 • 1(800) 632-0855 • FAX (918) 749-0855

October 9, 1995 **FCC MAIL ROOM**

William A. Caton, Secretary of FCC  
Federal Communications Commission  
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Washington, D.C. 20554

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We therefore urge the Commission to retain the current rule, thereby allowing us to continue to provide increased choice to our customers.

Sincerely,

*Ken Marshall*

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QUANTUM LEAP  
INCORPORATED

October 10, 1996

William Caton  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

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Dear Mr. Caton:

RE: Bundling of CPE by Interexchange Carriers, CC Docket 96-<sup>61</sup>~~91~~

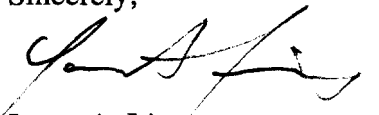
As a competitive Value Added Reseller ("VAR"), we wish to express our strong opposition to the Commission's proposal to allow interexchange carriers to bundle customer premises equipment ("CPE") with their regulated transmission service.

Value Added Resellers purchase equipment from independent CPE manufacturers. We then combine equipment from different manufacturers to provide customized solutions that meet the individualized needs of our customers. Because most of our customers are small to medium size businesses, they lack the resources or sophistication to assemble such customized solutions themselves. As a result, VARs are an important source of choice for these users.

If the Commission allows CPE bundling, we believe that many VARs and independent manufacturers will be forced out of business. This will eliminate diversity of selection and limit the dynamic range of products and custom solutions available to our customers today. Bundling would allow carriers to offer packages that combine transmission service with "free" CPE. As a result, end-users will have no practical choice but to accept the CPE chosen by their carriers, even if it is not the best equipment for their needs, and require that end users obtain service from interexchange carriers who are known for poor service industry wide. This result would not be in the public interest, or the interest of the independent industry.

We therefore urge the Commission to retain the current rule, thereby allowing us to continue to provide increased choice to our customers.

Sincerely,

  
Larry A. Lirgs  
Vice President  
Quantum Leap, Incorporated

rm

10/10/96  
10/10/96

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